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**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

FLAWLESS STYLE LLC and FLORIDAHUSKER
LLC,

Plaintiffs,

- against -

SAADIA GROUP LLC,

Defendant.

Case No. 1:23-cv-02354

**ORDER TO SHOW CAUSE FOR
PRELIMINARY INJUNCTION AND
TEMPORARY RESTRAINING
ORDER**

Upon the First Amended Complaint in this action and the exhibit attached thereto, the Declaration of Gabrielle Union and the exhibits attached thereto, the Declaration of Matthew S. Barkan and the exhibits attached thereto, the accompanying Memorandum of Law in Support of Motion for Temporary Restraining Order and Preliminary Injunction, and all proceedings heretofore had in this action, it is hereby:

ORDERED, that the above named defendant show cause before a motion term of this Court, at Room __, United States Courthouse, 500 Pearl Street, in the City, County and State of New York, on April __, 2023, at _____ o'clock in the _____noon thereof, or as soon thereafter as counsel may be heard, why an order should not be issued pursuant to Rule 65 of the Federal Rules of Civil Procedure enjoining Saadia Group LLC, and its subsidiaries, partners, members, officers, agents, servants, employees, attorneys, and those in active concert or

participation with them or any of them who receive actual notice of the order and judgment temporarily restraining and permanently enjoining them from:

1. any further use of Plaintiffs' intellectual property, including in whole or in part the trademark "GABRIELLE UNION," or any other mark, word, name or symbol confusingly similar to the GABRIELLE UNION mark which is likely to cause confusion, mistake or to deceive in connection with any merchandise, goods, or services; and
2. continuing the acts of unfair competition herein complained of, including but not limited to any use of the name "Gabrielle Union" or any other conduct that falsely suggests an ongoing association between Plaintiffs or their goods, on the one hand, and Defendant and its goods, on the other; and
3. manufacturing, distributing or selling any Collection Merchandise, as defined in the License Agreement; and it is further

ORDERED that the Defendant file with the Court and serve upon Plaintiff's counsel, within thirty (30) days after service of the order of injunction, a report in writing under oath setting forth in detail the manner and form in which Defendant has complied with the injunction; and it is further;

ORDERED that, sufficient reason having been shown therefor, pending the hearing of the Plaintiff's motion for a preliminary injunction, pursuant to Rule 65, Fed. R. Civ. P., Saadia Group LLC, its parent companies, subsidiaries, affiliates, representatives and anyone acting in concert with Saadia Group LLC, are temporarily restrained and permanently enjoined for fourteen days from:

1. any further use of Plaintiffs' intellectual property, including in whole or in part the trademark "GABRIELLE UNION," or any other mark, word, name or symbol confusingly similar to the GABRIELLE UNION mark which is likely to cause confusion, mistake or to deceive in connection with any merchandise, goods, or services; and
2. continuing the acts of unfair competition herein complained of, including but not limited to any use of the name "Gabrielle Union" or any other conduct that falsely suggests an ongoing association between Plaintiffs or their goods, on the one hand, and Defendant and its goods, on the other; and
3. manufacturing, distributing or selling any Collection Merchandise, as defined in the License Agreement; and it is further

ORDERED that a copy of this Order to Show Cause together with a copy of the Complaint and annexed exhibits, the accompanying declarations and the exhibits attached thereto, and the accompanying Memorandum of Law in Support of Motion for Temporary Restraining Order and Preliminary Injunction shall be served on the defendant, or its counsel, no later than April __, 2023, by email and FedEx.

DATED: New York, New York
April __, 2023

United States District Judge